

REMARKS

This is a full and timely response to the non-final Office Action mailed September 27, 2005. Reconsideration and allowance of the application and presently pending claims are respectfully requested.

Present Status of Patent Application

Upon entry of the amendments in this response, claims 1-2, 4-5, and 11-27 remain pending in the present application. More specifically, claims 21-27 have been newly submitted with no new material being added; claims 1, 2, 4, 5, 11, and 16 have been currently amended with no introduction of new matter; and claims 3 and 6-10 have been canceled. Applicants have canceled these claims merely to reduce the number of disputed issues and to facilitate early allowance and issuance of other claims in the present application. Applicants reserve the right to pursue the subject matter of these claims in a continuing application, if Applicants so choose, and do not intend to dedicate the canceled subject matter to the public. Reconsideration and allowance of the application and presently pending claims are respectfully requested.

A. Claim Objections

Statement of the Objection

Claims 1-10 are objected to because of the following informalities: in line 7 of claim 1, - of the substrate -- should be inserted after "surfaces", since a major surface of the die is also referenced in the claim. Appropriate correction is required.

Response to the Objection

Claim 1 has been appropriately amended as per the Office Action recommendation. Since the objection has been overcome, Applicants respectfully request allowance of claim 1 as well as the corresponding dependent Claims 2, 4, and 5 that are currently pending. Claims 3 and 6-10 have been canceled.

B. Claim Rejections under 35 U.S.C. §102(b)

Statement of the Rejection

Claims 1, 2, 6, 7, 11, 12, 16 and 18 are rejected under 35 U.S.C. §102(b) as being anticipated by US Patent No. 6,268,654 to Glenn et al.

Response to the Rejection

A proper rejection under 35 U.S.C. §102(b) requires that a single prior art reference

disclose each element of the claim. Furthermore, anticipation requires that each and every element of the claimed invention be disclosed in a single prior art reference.

Applicants respectfully assert that claims 1, 2, 6, 7, 11, 12, 16 and 18 are now in condition for allowance. Further remarks elaborating on Applicant's assertion have been provided below for each of the rejected claims.

Claim 1

The Office Action asserts that Glenn et al. anticipates Applicant's Claim 1. However, in doing so, the Office Action has improperly asserted that certain elements of Glenn et al. anticipate allegedly equivalent elements of Applicants' Claim 1. Specifically, attention is drawn to page 3, lines 6-7 of the Office Action ("a conductive interconnecting element (220) extending through the substrate and electrically interconnecting the mounting pad and the connecting pad"), which alleges that Glenn's *thermal* via 220 anticipates Applicants' conductive interconnecting element 120 that *electrically* interconnects Applicants' mounting pad 130 and connecting pad 140 (FIG. 1B to be used for Applicants' reference designators).

To the contrary, Applicants respectfully assert that Glenn's mounting pad and connecting pad are *not* electrically interconnected by thermal via 220. Applicants' assertion is based on Glenn's col. 12 lines 63-67, reproduced below for easy reference:

Substrate 200 includes *thermal vias 220*, which extend through substrate 200 and *conduct heat* from upper surface 201 to lower surface 202 of substrate 200. *By contrast, conductive vias 203* of substrate 200 *conduct electrical* signals to and from die 100. (Emphasis added)

This aspect is described further in Glenn's col. 13, lines 7-27 reproduced below for easy reference:

Heat sink metallization 221 is formed on lower surface 202 of substrate 200. Thermal vias 220 connect metal die pad 222 to heat sink metallization 221. Accordingly, *heat generated by die 100 is conducted from lower surface 102 of die 100 to die pad 222 to thermal vias 220 and thereby to heat sink metallization 221.* Heat sink metallization 221 may be formed on lower surface 202 of substrate 200 by the same conventional masking and etching process used to form metalizations 204 and 209, as described above. The size and shape of heat sink metallization 221 may vary, depending on the application. For example, heat sink metallization 221 may be square or rectangular in shape and may be the same area as die 100. As is conventionally known, metal solder may be used to thermally connect heat sink metallization 221 to a printed circuit board to dissipate heat from package 12.

Package 12 includes electrical conductors formed on upper surface 201 and lower surface 202 of substrate 200. These electrical conductors include metalizations 204 formed on upper surface 201 and metalizations 209 formed on lower surface 202 of substrate 200. *Metalizations 204 and 209 are electrically connected to vias 203.* Although not shown in FIG. 5, conductive contacts similar to contacts 207 and 209 of

FIG. 1 are formed on the ends of metalization 204 and 209, respectively. (Emphasis added)

As described above and illustrated in his FIG. 5, Glenn has made a clear distinction between a *thermal via 220* and an *electrically conductive via 203* and does not provide any indication or suggestion that the thermal via 220 may be used for electrical conduction.

However, in the interests of further clarifying the scope of the invention, Applicants have currently amended Claim 1 to include language that explicitly describes certain aspects related to connecting pad 140. This language includes the “electrically conductive connecting pad dimensioned to conform to an industry standard pad layout of a printed circuit board.” Glenn does not disclose such an industry standard pad layout for his heat sink metallization 221 (the alleged equivalent to Applicants’ connecting pad 140) because the primary purpose of his heat sink metallization 221 is to dissipate heat rather than to provide electrical conduction.

Applicants have further amended Claim 1 to include certain other elements, such as bonding pad 132, second connecting pad 142 and second interconnecting element 122, in addition to die mounting pad 130.

For at least the reasons described above, Applicants respectfully assert that the rejection of Claim 1 under 35 U.S.C. 102(b) is improper and hereby request withdrawal of the rejection followed by allowance of Claim 1.

Claim 2

Because Claim 1 is allowable, Claim 2 that depends directly or indirectly on Claim 1 is also allowable as a matter of law. *In re Fine*, 837 F.2d 1071 (Fed. Cir. 1988).

Applicants respectfully request withdrawal of the rejection, followed by allowance of Claim 2.

Claims 6-7

Claims 6 and 7 have been canceled thereby rendering moot the rejection of these claims.

Claim 11

Applicants’ currently amended Claim 11 includes a semiconductor device “in which the semiconductor die is mounted on the die mounting pad whereby an electrical connection is formed between the metallization on the at least a portion of the bottom surface of the die and the mounting pad.” The die mounting pad uses an interconnecting element that “electrically” interconnects the die mounting pad to a connecting pad located on the underside of the substrate.

The cited prior art of Glenn discloses “thermal vias 220 that extend through substrate 200 and conduct heat from upper surface 201 to lower surface 202 of substrate 200,” but fails to

disclose an electrical connection as described in Applicants' currently amended Claim 11. Consequently, Applicants respectfully assert that Claim 11 is allowable and hereby request withdrawal of the rejection followed by allowance of Claim 11.

Claims 12, 16 and 18

Because Claim 11 is allowable, Claims 12, 16 and 18 that depend directly or indirectly on Claim 11 is also allowable as a matter of law. *In re Fine*, 837 F.2d 1071 (Fed. Cir. 1988).

Applicants respectfully request withdrawal of the rejection, followed by allowance of Claim 12, 16 and 18.

C. Claim Rejections under 35 U.S.C. §103(a)

Statement of the Rejection

Claims 4, 5, 9, 14, 15, 19 and 20 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Glenn et al.

Response to the Rejection

Applicants respectfully request withdrawal of the rejection of claims 4, 5, 9, 14, 15, 19 and 20 for at least the reason that the rejection does not satisfy the requirements of MPEP § 2143.03, which states in pertinent part: "If an independent claim is nonobvious under 35 U.S.C. 103, then any claim depending therefrom is nonobvious. *In re Fine*, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988)."

Specifically, claims 4, 5, 9, 14, 15, 19 and 20 are nonobvious as each of them is a dependent claim. Each of the corresponding independent claims have not been rejected under 35 U.S.C. 103(a). Hence, Applicants respectfully assert that claims 4, 5, 9, 14, 15, 19 and 20 cannot be properly rejected under 35 U.S.C. 103(a), and hereby request withdrawal of the rejection followed by allowance of claims 4, 5, 9, 14, 15, 19 and 20.

Additionally, the MPEP provides several guidelines for rejecting a claim under 35 U.S.C. 103(a). Specifically, reference is made to MPEP 706.2(j) *Contents of a 35 U.S.C. 103 Rejection*, which states in pertinent part:

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art and not based on applicant's disclosure. *In re Vaeck*, 947

F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991). See MPEP § 2143 - § 2143.03 for decisions pertinent to each of these criteria.
(Emphasis added)

Comments related to MPEP 706.2(j) are presented below.

Claims 4 and 5

Claims 4 and 5 are each directly dependent on Claim 1 and therefore all the elements of Claim 1 are included in Claims 4 and 5 via the dependency. The cited prior art reference, Glenn et al, does not teach or suggest all the claim limitations of each of Applicants' Claims 4 and 5 at least because of the dependency of these claims to independent Claim 1. Glenn et al does not at least teach or suggest "a first *electrically conductive interconnecting element* extending through the substrate and *electrically interconnecting the mounting pad and the first electrically conductive connecting pad*," which is a part of Applicants' Claim 1.

Consequently, Applicants respectfully assert that a rejection under 35 U.S.C 103(a) would be improper because a *prima facie* case of obviousness cannot be established for at least the reason mentioned above.

Applicants respectfully request withdrawal of the rejection followed by allowance of Claims 4 and 5.

Claim 9

Claim 9 has been canceled thereby rendering moot the rejection of Claim 9.

Claims 14, 15, 19 and 20

Claims 14, 15, 19 and 20 are each dependent, directly or indirectly, on Claim 11 and therefore all the elements of Claim 11 are included in Claims 14, 15, 19 and 20 via the dependency. The cited prior art reference, Glenn et al, does not teach or suggest all the claim limitations of each of Applicants' Claims 14, 15, 19 and 20. Glenn et al does not at least teach or suggest a semiconductor device "in which the semiconductor die is mounted on the die mounting pad whereby an electrical connection is formed between the metallization on the at least a portion of the bottom surface of the die and the mounting pad," which is a part of Applicants' Claim 11.

Consequently, Applicants respectfully assert that a rejection under 35 U.S.C 103(a) would be improper because a *prima facie* case of obviousness cannot be established for at least the reason mentioned above.

Applicants respectfully request withdrawal of the rejection followed by allowance of Claims 14, 15, 19 and 20.

D. Claim Rejections under 35 U.S.C. §103(a)

Statement of the Rejection

Claims 3, 8 and 13 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Glenn et al. as applied to claims 1, 6 and 11 above, and further in view of US Patent No. 6,191,477 to Hashemi.

Response to the Rejection

In light of MPEP § 2143.03 described above, Applicants respectfully assert that dependent claims 3, 8 and 13 cannot be properly rejected under 35 U.S.C. 103(a), and hereby request withdrawal of the rejection followed by allowance of claims 3, 8 and 13. Additional arguments with reference to MPEP 706.2(j) *Contents of a 35 U.S.C. 103 Rejection* are presented below.

Claims 3 and 8

Claims 3 and 8 have been canceled thereby rendering moot the rejection of these claims.

Claim 13

Claim 13 depends directly on Claim 11 and therefore all the elements of Claim 11 are included in Claim 13 via the dependency. The cited prior art combination of Glenn et al. and Hashemi, does not teach or suggest all the claim limitations of Applicants' Claim 13. The combination does not at least teach or suggest "a first *electrically conductive interconnecting element* extending through the substrate and *electrically interconnecting the mounting pad and the first electrically conductive connecting pad*," which is a part of Applicants' Claim 11.

Consequently, for at least this reason, Applicants respectfully assert that a rejection of Claim 13 under 35 U.S.C. 103(a) would be improper and hereby request withdrawal of the rejection followed by allowance of Claim 13.

E. Claim Rejections under 35 U.S.C. §103(a)

Statement of the Rejection

Claim 17 has been rejected under 35 U.S.C. 103(a) as being unpatentable over Glenn et al. as applied to claim 16 above, and further in view of US Patent No. 6,084,295 to Horiuchi et al.

Response to the Rejection

In light of MPEP § 2143.03 described above, Applicants respectfully assert that dependent claim 17 cannot be properly rejected under 35 U.S.C. 103(a) and hereby request withdrawal of the rejection followed by allowance of claim 17. Additional arguments with reference to MPEP 706.2(j) *Contents of a 35 U.S.C. 103 Rejection* are presented below.

Claim 17

Claim 17 depends indirectly on Claim 11 and therefore all the elements of Claim 11 are included in Claim 17 via the dependency. The cited prior art combination of Glenn et al. and Horiuchi et al, does not teach or suggest all the claim limitations of Applicants' Claim 17. The combination does not at least teach or suggest "a first *electrically conductive interconnecting element* extending through the substrate and *electrically interconnecting the mounting pad and the first electrically conductive connecting pad*," which is a part of Applicants' Claim 11.

Consequently, for at least this reason, Applicants respectfully assert that a rejection of Claim 17 under 35 U.S.C. 103(a) would be improper and hereby request withdrawal of the rejection followed by allowance of Claim 17.

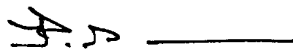
Prior Art Made of Record

The prior art made of record has been considered, but is not believed to affect the patentability of the presently pending claims.

CONCLUSION

In light of the foregoing amendments and for at least the reasons set forth above, Applicant respectfully submits that all objections and/or rejections have been traversed, rendered moot, and/or accommodated, and that claims 1-2, 4-5, and 11-27 are in condition for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested. If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned representative at (404) 610-5689.

Respectfully submitted,



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I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail, postage prepaid, in an envelope addressed to: Commissioner for Patents, P. O. Box 1450, Alexandria, VA, 22313-1450, on **December 23, 2005**



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